

**REMARKS**

In view of the following remarks, Applicant respectfully requests reconsideration and allowance of the subject application. No claims are cancelled. No claims are amended. This communication is believed to be  
 5 fully responsive to all issues raised in the Office Action mailed July 15, 2004.

**Rejections Under 35 U.S.C. §102**

Claims 1, 3, 4, 6-7, 9-17, 20-22, 24, 26-28 and 30-31 are rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,590,298 to  
 10 Kawamoto. (hereinafter, "Kawamoto"). Applicant traverses these rejections.

**Claim 1** is directed to a disk drive system having an array controller that receives a write command from a host. Claim 1 recites:

- a write stack drive to receive said write command and to store write operations within said. write command with  
 15 write stack operations on a non-volatile cache memory;  
 and
- a normal drive to receive said write command and to execute said write operations within said write command.

20 The office asserts that Kawamoto discloses these limitations. Applicant submits that Kawamoto cannot anticipate (or render obvious) independent claim 1 because Kawamoto neither discloses (nor even suggests) the limitation of *a write stack drive to receive said write command and to*

*store write operations within said write command with write stack operations on a non-volatile cache memory*, as explicitly recited in claim 1. The Office asserts that the Kawamoto discloses this limitation, and cites Col. 2 lines 38-40 to support the rejection. Applicant respectfully disagrees. The cited text,  
 5 beginning at Col. 2 line 33, reads as follows:

10 This invention is a method of restoring  
 write data in a disk cache system comprising a  
 host, a disk drive having a plurality of tracks  
 including a plurality of records, a cache memory,  
 15 a nonvolatile memory, and a disk controller,  
 wherein the disk controller stores tracks including  
 records corresponding to a read command sent  
 from the host in the cache memory from the disk  
 drive, and also stores the tracks including the  
 20 records updated by the host, into the nonvolatile  
 memory based on the write command sent from  
 the host, and restores the record updated by the  
 write command to the disk drive during the idle  
 time of the disk drive. The method includes  
 25 updating of records in the nonvolatile memory  
 based on the write command sent from the host;  
 updating the start address and the end address of a  
 record to be restored to the disk drive from the  
 nonvolatile memory, which is stored in the  
 30 directory within the nonvolatile memory for  
 controlling the track stored in the nonvolatile  
 memory, based on the address of the record  
 updated by the host; and restoring the record  
 updated by host to the disk drive on the basis of  
 the start address and end address of record to be  
 restored to the disk drive from the nonvolatile  
 memory stored in the directory.

Nothing in this text discloses (or even suggests) using write stack  
 operations in non-volatile memory to store received write operations, as  
 35 explicitly recited in claim 1. Therefore, the Kawamoto cannot anticipate  
 independent claim 1.

Claims 2-6 depend from claim 1 and as such contain limitations which  
 are not anticipated by Kawamoto.


**Independent claims 7, 13, 17, 24, and 28 and their associated**  
**dependent claims all contain limitations relating to normal disk drives and**  
**write stack drives or similar language. Kawamoto only describes and**  
**5 contemplates a single disk drive system and as such cannot anticipate these**  
**claims. Applicant respectfully requests that the §102 rejections of these**  
**claims be withdrawn.**

**CONCLUSION**

Claims 1-31 are believed to be in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of the present application. Should any issue remain that prevents immediate allowance of the application, the Office is encouraged to contact the undersigned attorney to discuss the unresolved issue.

Respectfully Submitted,  
Lee&Hayes PLLC

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